

REMARKS

The Office Action mailed March 31, 2005 has been received and the Examiner's comments carefully reviewed. Claim 15 has been amended to correct a typographical error. Claims 21-22 have been added. Support for added claims 21-22 is found in the specification, for example, on page 10, lines 13-14, and in originally filed claim 9.

Claims 1-22 are currently pending. Applicants respectfully submit that the pending claims are in condition for allowance.

Objection to the Specification

The Examiner objected to the specification due to the omission of an application serial number. Applicants have amended the specification to update the application serial number information in both the Cross-Reference to Related Applications section and the Detailed Description section of the specification. Applicants respectfully request withdrawal of this objection.

Rejections Under 35 U.S.C. §103

The Examiner rejected claims 1-19 under 35 U.S.C. §103(a) as being unpatentable over Stuble et al. (U.S. Patent 4,904,282) in view of Gillingham et al. (U.S. Patent 5,820,646). Applicants respectfully traverse this rejection.

A. Claims 1-8

Independent claim 1 recites a method of providing a media construction and cleaning the media construction. The media construction includes a plurality of flutes that result in an upstream flow face and a downstream flow face. The step of cleaning the media construction includes directing a flow of pressurized fluid into the media construction through the downstream flow face.

Stuble teaches an automated cleaning device 19 for cleaning filters 15 used in the textile industry. The filters are located within an outer casing 11 having an inlet nozzle 12 and an outlet nozzle 13. The filters have a dirty recess 16 side corresponding to an upstream side and a clean recess side 16' corresponding to a downstream side. The automated cleaning device 19 includes a beam 20 interconnected to a negative pressure

source 26. Suction devices 18 are mounted to the beam 20. To clean the filters 15, the beam 20 moves up and down along a groove 22, while the suction devices 18 suction textile particulates from the dirty side of the filters via suction noses 21. Column 5, lines 20-40.

Stuble does not teach or suggest a method of cleaning filters by directing a flow of pressurized fluid into the filter construction from the downstream flow face. In contrast, Stuble teaches a method of cleaning the filters by drawing or sucking air out from the filter construction from the upstream (dirty side) flow face.

Applicants respectfully submit that Gillingham does not make up for the deficiencies of Stuble. Accordingly, Applicants submit that independent claim 1, and dependent claims 2-8 are patentable.

B. Claims 9-14

Claim 9 recites a filter element including a first media construction and a second media construction. Each of the first and second media constructions includes flutes, and forms a non-rectangular parallelogram.

Stuble does not teach or suggest a filter element having first and second media construction having flutes. Stuble also does not teach or suggest a filter element having a non-rectangular parallelogram shape. Rather, Stuble teaches filters 15 that "are flat and rectangular" in shape. Column 4, lines 20-24. The Examiner relies upon Gillingham to make up for the deficiencies of Stuble. Gillingham, however, also does not teach or suggest a media formed in the shape of a non-rectangular parallelogram. Rather, Gillingham teaches a V-block 110 (FIG. 12) constructed of a pair of filter elements 50. The filter elements 50 form a rectangular shape, not a non-rectangular parallelogram, as required by claim 9.

Neither Stuble nor Gillingham teaches or suggests first and second filter media constructions that form a non-rectangular parallelogram. At least for this reason, Applicants respectfully submit that independent claim 9, and dependent claims 19-14 are patentable.

C. Claims 15-19

Claim 15 recites a gas turbine air intake system having a frame, a filter element mounted on the frame, and a cleaning system. The filter element includes a media construction having flutes that result in an upstream flow face and a downstream flow face. The cleaning system is oriented to send a flow of pressurized fluid into the media construction through the downstream flow face, and out the upstream flow face.

As previously described, the automated cleaning device 19 of Stuble includes a plurality of suction devices 18 interconnected to a negative pressure source 26. The suction devices 18 of Stuble create suction at the dirty side 16 of the filters 15 to clean the filters.

Stuble does not teach or suggest a system having a cleaning system oriented to send a flow of pressurized fluid into the filters 15 through the downstream flow face, and out the upstream flow face. Rather, Stuble teaches that the cleaning device 19 is oriented to draw or suck air from the filters 15 at the upstream flow face, not send a flow of pressurized fluid into the filter through the downstream flow face.

Gillingham does not disclose a cleaning system, and therefore does not make up for the deficiencies of Stuble. Accordingly, Applicants respectfully submit that independent claim 15, and dependent claims 16-19 are patentable.

D. Claim 20

Claim 20 recites a method of servicing a gas turbine air intake system. The method includes removing a first filter element from a tube sheet mounted on a frame, the step of removing including releasing a seal between the filter element and the tube sheet. The method also includes orienting a second new filter element into sealing engagement with the tube sheet.

Applicants respectfully submit that, first, Stuble does not teach or suggest a method of servicing a gas turbine air intake system. Stuble relates to an apparatus and method of filtering air containing textile impurities and fiber fragments from a textile machine or textile machine room. Column 3-4, lines 64-2. Stuble does not teach or suggest that the method of filtering fiber fragments from a textile machine can be incorporated into servicing a gas turbine air intake system. Second, Stuble does not teach or suggest that the filters 15 of the filter apparatus are mounted to tube sheet, or that the

filters 15 are sealingly engaged with tube sheet so that removal of the filters includes releasing a seal.

Where Stuble fails to teach or suggest the recited method, Gillingham does not make up for the deficiencies of Stuble. Gillingham teaches filter media that may be rolled or stacked in layers to match the shape of a duct. See Abstract. Gillingham does not teach or suggest that the filter media can be mounted to tube sheet, or that the filter media is sealingly engaged with tube sheet.

At least for these reasons, Applicants respectfully submit that claim 20 is patentable.

New Claims 21-22

New claims 21 and 22 depend upon claim 20. At least for the reasons discussed with regards to claim 20, Applicants respectfully submit that dependent claim 21 and 22 are patentable.

SUMMARY

It is respectfully submitted that each of the presently pending claims (claims 1-22) is in condition for allowance and notification to that effect is requested. The Examiner is invited to contact Applicants' representative at the below-listed telephone number if it is believed that prosecution of this application may be assisted thereby.

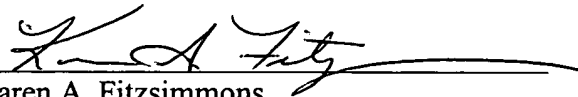
Although certain arguments regarding patentability are set forth herein, there may be other arguments and reasons why the claimed invention is patentably distinct. Applicants reserve the right to raise these arguments in the future.

Respectfully submitted,



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